

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LORI GJENASHAJ AND  
QAMIL GJENASHAJ

Plaintiff

vs.

THE CITY OF NEW YORK, LIEUTENANT MATTHEW HARRISON individually and in his official capacity, POLICE OFFICER GIANCARLO MARATEA individually and in his official capacity, POLICE OFFICER RAYCHEL CAMPANELLA-RIVERA individually and in her official capacity, POLICE OFFICER VANESA MEDINA individually and in her official capacity, POLICE OFFICER BRUNILA SANTANA and individually and in her official capacity, and POLICE OFFICER THOMAS GUGLIUCCI, individually and in his official capacity, employees of The City of New York.

Defendants

**DECLARATION OF  
EDWARD STONE IN SUPPORT  
OF PLAINTIFF'S OPPOSITION  
TO DEFENDANTS' MOTIONS *IN  
LIMINE***

Civil Action No. 19-CV-04142

I, **EDWARD STONE**, an attorney duly admitted to practice in the State of New York and in this Court, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, declare that the following is true and correct:

Along with Joseph I. Stone, I am counsel for Plaintiff, Lori Gjenashaj. As such, I am familiar with the facts and circumstances of this action and submit this declaration to place on the record relevant documents in opposition to defendants motions *in limine*.

1. Annexed hereto as **Exhibit A** are relevant excerpts from the February 10, 2020 deposition of Plaintiff Lori Gjenashaj. This exhibit is referred to as “**Pl. Dep.**” in Plaintiff’s Memorandum of Law in Opposition to Defendants’ Motions *in Limine*.

2. Annexed hereto as **Exhibit B** is this case’s Second Amended Complaint. This exhibit is referred to as “**SAC**” in Plaintiff’s Memorandum of Law in Opposition to Defendants’ Motions *in Limine*.

3. Annexed hereto as **Exhibit C** are relevant excerpts from the July 1, 2020 deposition of Qamal Gjenashaj. This exhibit is referred to as “**Q. Gjenashaj Dep.**” in Plaintiff’s Memorandum of Law in Opposition to Defendants’ Motions *in Limine*.

4. Annexed hereto as **Exhibit D** are the F.I.D. interviews of Police Officer Santana and Police Officer Orihuela.

5. Annexed hereto as **Exhibit E** is the July 3, 2018 F.I.D. interview of Police Officer Maratea.

6. Annexed hereto as **Exhibit F** is Document 122 of this case, minutes from the May 4, 2021 conference held before Judge William H. Pauley, III. This exhibit is referred to as “**Conf. Minutes**” in Plaintiff’s Memorandum of Law in Opposition to Defendants’ Motions *in Limine*.

New York, New York

DATED: September 15, 2021

/s/ Edward S. Stone  
Edward S. Stone, Esq.